

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 17-74 are currently pending, Claims 17 and 46 are amended by the present amendment. Applicant respectfully submits that support for these claim amendments is self-evident from Applicant's originally-filed disclosure, including the claims and drawings. As such, no new subject matter is introduced by these changes.

In the outstanding Office Action, Claims 17-19, 22, 25-29, 31-40, 45-48, 51, 54-58, 60-69 and 74 were rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 5,535,011 to Yamagami et al. (herein "Yamagami"); Claims 30 and 59 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami; Claims 20-21 and 49-50 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of U.S. Patent No. 5,430,496 to Silverbrook; Claims 23-24, 52 and 53 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of U.S. Patent No. 5,809,068 to Johnson; Claims 41, 42, 70 and 71 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of U.S. Patent No. 5,018,017 to Sasaki et al. (herein "Sasaki"); and Claims 43, 44, 72 and 73 were rejected under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of U.S. Patent No. 5,771,354 to Crawford.

Applicant respectfully traverses the rejection of Claims 17-19, 22, 25-29, 31-40, 45-48, 51, 54-58, 60-69 and 74 under 35 U.S.C. § 102(e) as anticipated by Yamagami, with respect to amended Claims 17 and 46.

Amended Claim 17 is directed to a digital image capturing system including a digital image capturing device that includes, *inter alia*, an electronic image pick-up which receives images through the lens, a processor connected to the electronic image pick-up, a first input/output interface connected to the processor, and a second input/output interface

connected to the processor. The second input/output interface is configured to receive a card that stores a control program. The image capturing device also includes a memory configured to receive the control program from the card, and the processor is configured to control the card through the second input/output interface by executing the control program. Amended independent Claim 46 includes similar features.

In a non-limiting example, Applicant's Figure 1 shows an example of a digital image capturing system that includes a digital camera 30 (e.g., digital image capturing device). As shown in the example of Applicant's Figure 6, digital camera 30 includes a CCD 9 (e.g., electronic image pick-up) connected to a digital signal processing circuit 11 and CPU 23 (e.g., processor). The CPU 23 is connected to the first and second card connectors 17a/17b (e.g., first and second input/output interfaces), and the connectors are configured to receive at least an I/O card 15 or a memory card 16, each of which may store a control program that can be used by the CPU in the camera to control the card.¹ According to the example in Applicant's Figure 7, the CPU may include a control program storing area 51 that includes a rewritable and optional routines area 54 that may receive a control program from the card (e.g., a memory configured to receive the control program from the card).

According to this example, the CPU in the camera may advantageously execute the control program received from the card and thereby control the card. Thus, the CPU in the camera may read and utilize new file formats or interface protocols even if the control programs for those formats or protocols are not pre-programmed in the camera.²

Applicant respectfully submits that Yamagami does not teach or suggest each feature of the amended independent claims. In particular, Yamagami does not teach or suggest a digital image capturing device that includes a processor that executes a control program received from a card to control the card through an interface. Yamagami describes a digital

¹ Specification at page 17, line 20 to page 18, line 24.

² Specification at page 17, lines 9-19.

camera 100 including an extended interface 110 that can be coupled to an extended card 111. The extended card 111 may include a RISC CPU 701 and a flash ROM 703, and the extended card 111 may receive a program for the RISC CPU 701 from a recording medium 101 via the camera. Thus, Yamagami indicates that a memory on an external card may receive a program, and a CPU on the external card may execute the program. However, Yamagami does not describe any processor in the image capturing device that receives a program from a card and executes the program to control the card through an interface. Accordingly, Applicant respectfully submits that Yamagami does not teach or suggest a digital image capturing device that includes “a memory configured to receive the control program from the card, and the processor is configured to control the card through the second input/output interface by executing the control program,” as recited in amended Claim 17 and as similarly recited in amended Claim 46.

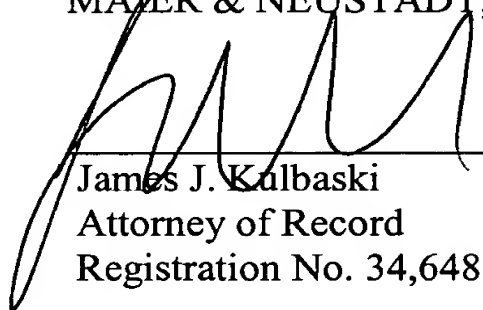
Accordingly, Applicant respectfully submits that independent Claims 17 and 46, and claims depending therefrom, are allowable.

Further, Applicant respectfully traverses the rejections of Claims 20-21, 23-24, 30, 41-44, 49-50, 52, 53, 59 and 70-73 under 35 U.S.C. § 103(a) as unpatentable over Yamagami in view of Silverbrook, Johnson, Sasaki or Crawford. Claims 20-21, 23-24, 30, 41-44, 49-50, 52, 53, 59 and 70-73 depend from Claim 17 or 46, which as discussed above are believed to be allowable. Further, Applicant respectfully submits that Silverbrook, Johnson, Sasaki and Crawford, either individually or in combination, do not teach or suggest the claimed features lacking in the disclosure of Yamagami, as discussed above. Accordingly, Applicant respectfully requests those rejections be withdrawn.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



James J. Kulbaski
Attorney of Record
Registration No. 34,648

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 06/04)

JJK/ZSS:dnf

I:\ATTY\ZS\21'S\214\214675US2CONT\214675 AMD 071305.DOC